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December 18, 2024

VIA CM/ECF FILING

The Honorable Edward S. Kiel, U.S.D.J.
U.S. District Court for the District of New Jersey
Mitchell H. Cohen Building and U.S. District Courthouse
4th and Cooper Streets
Camden, New Jersey 08101

The Honorable Ann Marie Donio, U.S.M.J.
U.S. District Court for the District of New Jersey
Mitchell H. Cohen Building and U.S. District Courthouse
4th and Cooper Streets
Camden, New Jersey 08101

**Re: *Severa v. Solvay Specialty*, 1:20-cv-6906 ESK-AMD, Withdrawal of Sealing Motions
found at ECF Nos. 238, 250, and 253**

Dear Judge Kiel and Judge Donio:

I write on behalf of Objectors for the purpose of withdrawing their Motions to seal certain documents in the above-referenced case. This subject was discussed at some length during the fairness hearing that occurred yesterday.

Inasmuch as the Court has now ruled upon and approved the revised proposed settlement, in a sense, the exhibits to which counsel for Solvay objected are now moot. Further, Objectors do not object to the Court striking those exhibits from the Court's filing so that they are not part of any record on appeal in the unlikely event that an appeal to the Third Circuit is prosecuted. Of course, since the documents in question have been under seal, there is no danger that they have been viewed by anyone not entitled to do so.

As indicated in yesterday's proceedings, Objectors are not in agreement with the assertions made by Solvay's counsel. However, since the Court has ruled on the underlying question, and there is now a withdrawal of the sealing motions, and an agreement to remove certain exhibits from the record, briefing a moot issue seems a pointless expenditure of the time for the parties and the Court.

Accordingly, we respectfully ask the Court to treat the sealing motions as withdrawn and to grant Solvay's application to remove certain Exhibits (ECF No. 255) from the record of these proceedings.

Respectfully submitted,

/s/ Steven J. Phillips

Steven J. Phillips

cc: All Counsel (via ECF)